

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOHNATHAN CRAFT, et al.

Defendant.

**Case No. 1:19-cr-01631 DHU**

**DEFENDANT JONATHAN CRAFT'S UNOPPOSED MOTION  
TO EXTEND TIME TO FILE SENTENCING MEMORANDUM**

COMES NOW, Defendant Jonathan Craft, by and through his counsel, Barrett (Barry) G. Porter of Burgess and Porter LLC, and respectfully requests that this Court extend the current deadline of January 11, 2024, to file the Sentencing Memorandum in this matter, as well as extend the time for the government to file their response to same.

In support of this Motion, Counsel states as follows:

1. July 13, 2023, Jonathan Craft accepted a plea and pled to Information Count 1: Prohibited Person in Possession of Firearm, and Second Superseding Indictment Count 7: Conspiracy (Doc. 577).
2. This Court scheduled a sentencing hearing for February 1, 2024, and a deadline to submit his sentencing memorandum by January 11, 2024. The deadline for filing the sentencing memorandum for the other codefendants in this case is set for January 16, 2024.
3. Defendant requests that his deadline likewise be set and extended from January 11, 2024, to January 16, 2024.

4. Additionally, the defense is requesting a corresponding extension of time for the government to respond to the sentencing memorandum if necessary. The current deadline for the filing of response is January 18, 2024. The new deadline for responses to the sentencing memoranda will be January 25, 2024.

5. Mr. Craft is currently in custody at the Cibola County Correctional Facility in Milan, NM.

6. Defense counsel contacted Assistant United States Attorney, Leticia Simms and she does not oppose the relief requested in this motion.

WHEREFORE the defendant respectfully requests that the Court enter an order granting an extension of time to file sentencing memorandum to January 16, 2024, and January 25, 2024, for the filing of any responses to the sentencing memoranda.

Respectfully Submitted,

BURGESS & PORTER LLC

By: /s/ *Barrett (Barry) G. Porter*  
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*Attorney for Defendant Craft*

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY I filed the foregoing electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

Leticia Simms  
Assistant United States Attorney  
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/s/ Barrett (Barry) G. Porter  
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